

Exhibit A

29. All documents related to the entities or individuals that have a financial stake in any of the Patents-in-Suit, or in the present litigation.
30. All communications exchanged between Netlist and Micron related to any of the Patents-in-Suit.
31. All agreements relating to this action between Netlist and any person or entity.
32. All documents and things related to Netlist's pre-suit investigation of Micron's alleged infringement of any of the Patents-in-Suit.
33. Documents and things sufficient to identify all persons involved in Netlist's pre-suit investigation of any Micron products accused of infringement.
34. Documents and things sufficient to show how and when Netlist (i) tested or (ii) examined any Micron products accused of infringement.
35. Documents and things sufficient to show how and when Netlist compared any Micron products accused of infringement with claims of the Patents-in-Suit before filing this action.
36. Documents and things sufficient to show any claim constructions applied during Netlist's pre-filing investigation.
37. All documents and things relied on by Netlist to form its pre-suit basis that any Micron products infringe.
38. All documents and things relating to, supporting, or undermining Netlist's allegations that Micron infringed any claim of the Patents-in-Suit, including but not limited to any and all claim charts.
39. All documents and things relating to the construction, interpretation, or scope of any terms in the Patents-in-Suit.
40. All documents and things that refer to any settlement or license negotiations with any person involving any of the Patents-in-Suit, including, but not limited to, all draft, proposed and executed settlement agreements.
41. All documents and things relating to the assignment to Netlist of any of the Patents-in-Suit.
42. Any patents, publications, or products identified by anyone as potentially invalidating prior art to any of the Patents-in-Suit.
43. Documents and things sufficient to identify all licensees of any of the Patents-in-Suit.
44. All documents and things relating to any licensees' sale of any products or services allegedly covered by any of the Patents-in-Suit.

45. All business plans, strategic plans, marketing plans, financial plans, or other plans relating to any of the Patents-in-Suit.
46. All documents and things relating to any negotiation (regardless of whether an agreement was ever consummated) for any assignment, purchase, sale, license, cross-license, security interest, loan, or grant of any rights with respect to any of the Patents-in-Suit.
47. All documents and things relating to any sale or purchase of any of the Patents-in-Suit.
48. All documents and things relating to any license or offer to license any of the Patents-in-Suit.
49. All documents and things relating to Netlist's licensing policies or practices.
50. All documents and things relating to valuation of any of the Patents-in-Suit.
51. Documents and things sufficient to show the corporate structure of Netlist, including the identity of each legal entity in which Netlist has an ownership interest or that has an ownership interest in Netlist, as well as the extent, nature, and amount of such interest and the rights (such as control) associated with that interest.
52. Documents sufficient to identify each person or entity who is providing financial assistance or who has a financial or contingent interest in this action.
53. All documents relating to any third party's provision of financial assistance to Netlist or to its financial or contingent interest in this action.
54. All documents referenced in Netlist's interrogatory responses.
55. All documents and things Netlist produced or relied upon (including, without limitation, any briefs, supporting exhibits, deposition transcripts, and expert reports) in *Netlist, Inc. v. Samsung Electronics Co., Ltd.*, 2:21-cv-00463 (E.D. Tex.) or *Samsung Electronics Co., Ltd. v. Netlist, Inc.*, 1:21-cv-01453 (D. Del.).
56. Netlist's responses to discovery requests in *Netlist, Inc. v. Samsung Electronics Co., Ltd.*, 2:21-cv-00463 (E.D. Tex.) or *Samsung Electronics Co., Ltd. v. Netlist, Inc.*, 1:21-cv-01453 (D. Del.).
57. All documents and things Netlist produced or relied upon (including, without limitation, any supporting exhibits, deposition transcripts, expert reports, witness statements, briefs, trial demonstratives) in Netlist's litigation against SK hynix or affiliate(s) of SK hynix, including (without limitation) *Memory Modules and Components Thereof*, 337-TA-1089 (ITC), *Memory Modules and Components Thereof*, 337-TA-1023 (ITC), *Netlist, Inc. v. SK hynix, Inc.*, 8:16-cv-01605 (C.D. Cal.), *Netlist, Inc. v. SK Hynix, Inc.*, 8:17-cv-01030 (C.D. Cal.), *Netlist, Inc. v. SK hynix*, 6:20-cv-00194 (W.D. Tex.), and *Netlist, Inc. v. SK hynix*, 6:20-cv-00525 (W.D. Tex.), and any appeals thereto.